

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)	
)	Criminal Case No. 1:21-cr-193-LM-01/02
v.)	
)	Count 1: Conspiracy to Commit Firearms
ANISHA CORREA and JULIUS)	Trafficking
CLEMENTE, a/k/a "Q,")	(18 U.S.C. §§ 371, 922(a)(1))
)	
Defendants)	
)	
)	
)	

INDICTMENT

The Grand Jury charges:

Background

At all times relevant to this Indictment:

1. Defendant ANISHA CORREA resided in Manchester, New Hampshire.
2. Defendant JULIUS CLEMENTE, a/k/a "Q," resided in Brockton, Massachusetts.
3. Neither of the defendants were licensed to sell firearms.
4. A person purchasing firearms from a federal firearms licensee ("FFL") is required to complete an ATF Form 4473 and certify that he or she is the actual buyer or transferee of the firearm and the firearm is not being acquired on behalf of someone else.

COUNT ONE

Conspiracy to Commit Firearms Trafficking
18 U.S.C. §§ 371 and 922(a)(1)

The Conspiracy

5. Beginning at an unknown date, but at least by December 2020, and continuing through in or about April 2021, in the District of New Hampshire and elsewhere, the defendants,

ANISHA CORREA and

JULIUS CLEMENTE, a/k/a “Q,”

did knowingly and unlawfully combine, conspire, agree with each other and with other persons known and unknown to the Grand Jury to commit an offense defined in Title 18, United States Code, Section 922(a)(1), namely, to engage in the business of dealing in firearms without being a licensed firearms dealer.

The Object of the Conspiracy

6. The object of the conspiracy was to purchase firearms from federal firearms licensees (“FFLs”) in New Hampshire and sell them to persons who resided outside of New Hampshire or were ineligible to purchase firearms.

Manner and Means

7. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

8. CORREA purchased at least 20 firearms from several FFLs in New Hampshire. She also attempted to purchase at least another three firearms from some of the same FFLs. CORREA frequently paid in cash and was accompanied by CLEMENTE on some of these purchases.

9. On multiple occasions, CORREA and CLEMENTE coordinated with each other to arrange the purchases and/or subsequent sales of particular firearms. Communications between them demonstrate that they devoted time, attention, and labor to dealing in firearms as a regular course of trade or business with the principal objective of livelihood and profit through the repetitive purchase and resale of firearms.

10. CORREA and CLEMENTE ultimately sold and transferred at least some of the purchased firearms to persons living outside of New Hampshire.

Overt Acts in Furtherance of the Conspiracy

11. In furtherance of the conspiracy and to effect the illegal acts thereof, at least one of the following overt acts, among others, were committed in the District of New Hampshire and elsewhere:

12. On or about the dates listed below, ANISHA CORREA purchased at least 20 firearms from multiple FFLs in New Hampshire as follows:

Gun #	Purchase Date	Date of Possession	Manufacturer	Model	Caliber	Serial #
1	12/01/20	(soon after)	Glock	43	9	AEUS873
2	12/04/20	12/08/20	Glock	42	380	AEWA982
3	12/07/20	12/08/20	Taurus	PT 111 G2A	9	ABL116963
4	12/07/20	12/08/20	Smith & Wesson	M&P 40 Shield	40	JFP3889
5	12/07/20	12/08/20	Taurus	PT 111 G2C	9	ABL185664
6	01/06/21	(soon after)	Glock	43	9	ZNR924
7	01/08/21	(soon after)	Taurus	G3	9	ABN363338
8	01/13/21	01/15/21	Glock	42	380	AFAG049
9	01/15/21	01/18/21	Glock	43X	9	BPAX649
10	01/15/21	(soon after)	Glock	19X	9	AFBG157
11	01/18/21	01/25/21	FNH USA, LLC	509	9	GKS0114686
12	01/18/21	01/25/21	Smith & Wesson	M&P 9 Shield	9	JFN1404
13	01/18/21	01/25/21	Glock	30	45	BSBW600
14	02/18/21	02/24/21	Kimber	Micro 9	9	TB0021089
15	02/23/21	02/24/21	Smith & Wesson	M&P 40 Shield	40	JHR8230
16	02/23/21	02/24/21	Berretta	APX	9	AXC039879
17	03/06/21	(soon after)	Glock	27 Gen 4	40	XYN011
18	03/07/21	(soon after)	Sturm Ruger	LCP	380	380623364
19	03/09/21	(soon after)	Smith & Wesson	M&P 9 Shield	9	JFX3961
20	03/10/21	(soon after)	Glock	43X	9	BSEE650

13. On or about the dates listed below, ANISHA CORREA attempted to purchase at least three firearms from multiple FFLs in New Hampshire as follows:

Gun #	Purchase Date	Manufacturer	Model	Caliber	Serial #
A	02/26/21	Sig Sauer	P365	9	66B306021
B	02/26/21	Beretta	APX	9	A125569X
C	03/11/21	Smith & Wesson	MP Shield EZ	9	RJV4931

14. On or about February 26, 2021, JULIUS CLEMENTE accompanied ANISHA CORREA on a visit to an FFL, where CORREA attempted to purchase two firearms. CORREA was short on cash and asked CLEMENTE to withdraw money from an ATM at a nearby store.

15. At ANISHA CORREA's request, on or about February 26, 2021, JULIUS CLEMENTE used a debit card to withdraw \$40 in cash via an ATM.

16. As the scheme progressed, JULIUS CLEMENTE and ANISHA CORREA solicited Person A to purchase firearms on behalf of CLEMENTE, in other words, to be a "straw purchaser" for CLEMENTE. Person A subsequently attempted to purchase at least two firearms from FFLs for CLEMENTE.

All in violation of Title 18, United States Code, Sections 371 and 922(a)(1).

NOTICE OF FORFEITURE

Upon conviction of the offense alleged in Count One of this Indictment, the defendants shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) any firearms and ammunition involved in the commission of the offense.

(All in accordance with 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.)

A TRUE BILL

Dated: December 6, 2021

/s/ Foreperson
FOREPERSON

JOHN J. FARLEY
ACTING UNITED STATES ATTORNEY

By: /s/ Alexander S. Chen
Alexander S. Chen
Special Assistant U.S. Attorney

Seth R. Aframe
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